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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

UNITED STATES OF AMERICA,	:	<u>FELONY</u>
	:	<u>COMPLAINT</u>
Plaintiff,	:	
vs.	:	VIOLATION: 2:20-mj-00466-DBP
	:	Count 1: 18 U.S.C. § 844(i), Arson in
LATEESHA RICHARDS,	:	Interstate Commerce
A.K.A. LATEESHA KAHRYN	:	
RITCHARDS,	:	
Defendant.	:	Chief Magistrate Judge Dustin B. Pead

Before the Honorable Dustin B. Pead, United States Chief Magistrate Judge for the
District of Utah, appeared the undersigned, who on oath deposes and says:

COUNT 1
18 U.S.C. § 844(i)
[Arson in Interstate Commerce]

On or about May 30, 2020, in the District of Utah,

LATEESHA RICHARDS,

Defendant herein, maliciously damaged and destroyed, and attempted to maliciously damage and destroy, by means of fire and explosives, a vehicle, to wit: a Salt Lake City Police Department patrol car, used in interstate commerce and in activities affecting interstate commerce, and did aid and abet therein; all in violation of 18 U.S.C. §§ 844(i) and 2.

AFFIDAVIT IN SUPPORT OF COMPLAINT AND ARREST WARRANT

Complainant, JEFFREY T. WRIGHT, being duly sworn, hereby states:

1. I, Jeffrey T. Wright, am a Special Agent with the United States Department of Justice, Federal Bureau of Investigation, and have been employed in that capacity for approximately 12 years. I am currently assigned to the Salt Lake City Division of the FBI and have primary investigative responsibility for federal crimes related to national security and domestic terrorism. I gained experience in the conduct of such investigations through previous case investigations, formal training, and in consultation with law enforcement partners in local, state and federal law enforcement agencies. I have been trained to investigate federal crimes and have investigated an array of complex federal crimes.
2. The statements in this affidavit are based, in part, on information provided by law enforcement officers, other investigators with knowledge of this investigation, and witnesses who observed the incident, as well as information obtained from the State of Utah. Since this affidavit is being submitted for the limited purpose of securing a criminal complaint I have not included every fact known to me concerning this investigation. Rather, I have set forth only the facts necessary to establish probable

cause for the complaint.

Statement of Probable Cause

3. On May 30, 2020, protestors took to the streets of Salt Lake City, Utah, to call for justice after the killing of George Floyd on May 25, 2020 in Minneapolis, Minnesota. Some of the protestors were non-residents of Utah.
4. Similar protests occurred in other cities across the United States in the days following May 25, 2020. Some of the protests devolved into vandalism, property damage, arson and other riotous acts.
5. The downtown area of Salt Lake City, Utah hosts myriad companies, commercial properties, retail establishments, restaurants, gas stations, public facilities and other businesses that were open for business on May 30, 2020, during the time of the protest.
6. During the protest, Salt Lake City Police Officers and other law enforcement personnel were deployed throughout the downtown area to protect individuals, businesses, and property. Police officers used law enforcement vehicles throughout the protest to transport law enforcement personnel, to provide emergency aid and assistance, and to serve as a resource for crowd control measures.
7. The Salt Lake City Police Department regularly conducts business in interstate commerce, for instance, by purchasing vehicles and other equipment and supplies in interstate commerce. The activities of the Salt Lake City Police Department in enforcing laws also affect interstate commerce.

8. On the afternoon of May 30, 2020, the peaceful protest in downtown Salt Lake City devolved into acts of destruction and violence. Rioters near the Salt Lake City library at 200 East 400 South overturned a Salt Lake City Police Department patrol car. Moments later rioters set the patrol car ablaze.
9. Video footage shows individual rioters using fire and explosives to damage and destroy the patrol car.
10. The patrol car was engulfed in flames, as shown in the photograph below:



11. The patrol car was completely destroyed by fire, as shown in the photograph below:

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12. On May 31, 2020, ATF Special Agent Certified Fire Investigator Candidate Tyler Olson and Salt Lake City Fire Investigators examined the destroyed patrol car. The patrol car is a Chevrolet Impala. From the physical examination of the vehicle, and video and photographic evidence, it is SA Olson's opinion that the destruction of the patrol car was incendiary in nature.
13. Video footage from May 30, 2020, shows an individual, later identified by police as LATEESHA RICHARDS, holding a cell phone in her right hand as she walks towards the overturned police car. RICHARDS is wearing a t-shirt with an orange and grey tie-dye design, black jeans, and white tennis shoes. She has a blue medical mask

tethered to her ears and fastened below her nose. What appears to be a tattoo of red lips is visible on the right side of RICHARDS' neck. See exhibit 1 below:



14. RICHARDS is then observed taking an apparent selfie with the burning police car as her background. See exhibit 2 below:

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15. RICHARDS walks away from the patrol car momentarily and then returns to the patrol car holding what appears to be an item of clothing in her right hand. The apparent clothing item is red, black and white in color. RICHARDS bends down facing the burning patrol car and tosses the item onto the small flames and then runs away. See exhibits 3, 4 and 5 below:

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16. The clothing item that RICHARDS threw onto the fire acted as kindling and increased the size of flames.
17. Shortly thereafter, RICHARDS returned with Latroi Newbins to take more apparent selfies with the burning police car as their background. See exhibit 6 below:



18. Law enforcement officers with Salt Lake City Police Department identified

RICHARDS based on her driver's license photo, a booking photo, and her neck tattoo.

19. Based on the foregoing information, I respectfully request an arrest warrant be issued for LATEESHA RICHARDS for a violation of 18 U.S.C. § 844(i).

I swear that this information is true and correct to the best of my knowledge, information, and belief.

DATED this 18th day of June 2020.

Jeffrey T.
Wright

JEFFREY T. WRIGHT
FBI Special Agent

Digitally signed by Jeffrey T.
Wright
Date: 2020.06.18 10:55:13
-06'00'

Approved as to form:

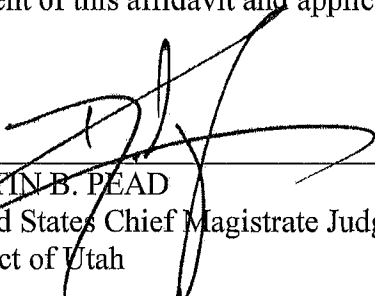
JOHN W. HUBER
United States Attorney

JONATHAN
YEATES
J. DREW YEATES
Assistant United States Attorney

Digitally signed by
JONATHAN YEATES
Date: 2020.06.18 10:18:27
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The affiant appeared before me by telephonic conference on this date pursuant to Fed.

R. Crim. P. 4.1 and affirmed under oath the content of this affidavit and application.


DUSTIN B. PEAD
United States Chief Magistrate Judge
District of Utah